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PROPOSED ATTORNEYS FOR THE DEBTORS AND DEBTORS IN POSSESSION

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Case No. 24-80045-11
	§	
KIDKRAFT, INC., et al.,	§	(Chapter 11)
	§	
Debtors. ¹	§	(Joint Administration Requested)
	§	

NOTICE OF AGENDA FOR FIRST DAY HEARINGS ON EMERGENCY MOTIONS ON MAY 13, 2024, AT 9:30 A.M. (CENTRAL TIME)

PLEASE TAKE NOTICE of the status and proposed disposition of the following matters

set for hearing on May 13, 2024, at. 9:30 a.m. (Central Time):

I. Items to Be Heard at First Day Hearing:

1. <u>Emergency</u> Motion for Entry of an Order Directing Joint Administration of the Debtors' Chapter 11 Cases [Docket No. 2].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

The Debtors in these chapter 11 cases and the last four digits of their respective federal tax identification numbers or Canadian business numbers, as applicable, are: KidKraft, Inc. (3303), KidKraft Europe, LLC (3174), KidKraft Intermediate Holdings, LLC (8800), KidKraft International Holdings, Inc. (2933), KidKraft Partners, LLC (3268), KidKraft International IP Holdings, LLC (1841), Solowave Design Corp. (9294), Solowave Design Holdings Limited (0206), Solowave Design Inc. (3073), Solowave Design LP (7201), and Solowave International Inc. (4302). The location of the Debtors' U.S. corporate headquarters and the Debtors' service address is: 4630 Olin Road, Dallas, TX 75244.

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

2. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 3].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

3. <u>Emergency</u> Motion for Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated Creditor Matrix; (B) File a Consolidated List of 30 Largest Unsecured Creditors; and (C) Redact Certain Personal Identification Information; (II) Approving Form and Manner of Notice of Commencement; and (III) Granting Related Relief [Docket No. 13].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

4. <u>Emergency</u> Application for Entry of Order Appointing Stretto, Inc. as Claims, Noticing, and Solicitation Agent [Docket No. 4].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

5. <u>Emergency</u> Motion for Entry of an Order (I) Scheduling a Combined Hearing, (II) Establishing Objection Deadlines, (III) Approving the Solicitation Materials and Tabulation Procedures, and (IV) Granting Related Relief [Docket No. 27].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. Certification of Stretto, Inc. Regarding Solicitation of Votes and Tabulation of Ballots Accept and Rejecting Debtors' Joint Prepackaged Chapter 11 Plan [Docket No. 30];
- c. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

6. <u>Emergency</u> Motion for an Order Pursuant to Bankruptcy Rule 1007 Granting an Extension of Time for Filing Schedules and Statements of Financial Affairs [Docket No. 15].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

7. <u>Emergency</u> Motion for Entry of an Order (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Other Compensation, and Reimbursable Expenses and (B) Continue Employee Benefits Programs and (II) Granting Related Relief [Docket No. 18].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

8. <u>Emergency</u> Motion for Entry of an Order (I) Authorizing KidKraft, Inc. to Act as Foreign Representative and (II) Granting Related Relief [Docket No. 14].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

9. <u>Emergency</u> Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts, (B) Continue Using Existing Checks and Business Forms, (C) Maintain Their Corporate Card Program, and (D) Continue Intercompany Transactions and (II) Granting Related Relief [Docket No. 20].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

10. <u>Emergency</u> Motion for Entry of an Order (I) Authorizing the Debtors to (A) Continue Their Prepetition Insurance Coverage and Satisfy Prepetition Obligations Related Thereto; (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Coverage on a Postpetition Basis in the Ordinary Course; and (C) Continue Their Prepetition Customs Bond Program and Satisfy Prepetition Obligations Related Thereto; (II) Modifying the Automatic Stay Solely With Respect to Workers' Compensation Claims; and (III) Granting Related Relief [Docket No. 7].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

11. <u>Emergency</u> Motion for Entry of an Order (I) Authorizing the Debtors to Pay Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 5].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

12. <u>Emergency</u> Motion for Entry of an Order (I) Approving the Debtors' Proposed Adequate Assurance Payments for Future Utility Services; (II) Prohibiting Utility Companies from Altering, Discontinuing, or Refusing Services; (III) Approving the Debtors' Proposed Procedures for Resolving Additional Adequate Assurance Requests; and (IV) Granting Related Relief [Docket No. 11].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

13. <u>Emergency</u> Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay (A) Critical Vendors, (B) Lien Claimants, and (C) 503(b)(9) Claimants; (II) Confirming Administrative Expense Priority of Outstanding Orders; and (III) Granting Related Relief [Docket No. 9].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

14. <u>Emergency</u> Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain and Administer Their Customer Programs; (B) Renew, Replace, Implement, or Modify Their Customer Programs; and (C) Honor Their Obligations Related to the Customer Programs, and (II) Granting Related Relief [Docket No. 10].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

15. <u>Emergency</u> Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 and Fed. R. Bankr. P. 2002, 4001 and 9014 (I) Authorizing Debtors and Debtors in Possession to Obtain Postpetition Senior Secured Superpriority Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition Secured Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [Docket No. 22].

Related Documents:

- a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];
- b. Declaration of Ajay Bijoor, Managing Director of Robert W. Baird & Co. Incorporated in Support of (I) the Debtors' Motion to Obtain Postpetition Debtor in Possession Financing, (II) the Sale Process, and (III) the Bid Protections [Docket No. 32];
- c. Declaration of Carl Moore, Managing Director of SierraConstellation Partners, LLC in Support of the Debtors' Motion to Obtain Postpetition Debtor in Possession Financing [Docket No. 33];
- d. The Debtors' Witness and Exhibit List for May 13, 2024 Hearing [Docket No. 36].

Moving Party: Debtors

Status: Uncontested. Going forward on May 13, 2024 at 9:30 a.m. (Central Time).

II. <u>ITEMS TO BE HEARD AT A LATER DATE:</u>

16. <u>Emergency</u> Motion for Entry of an Order (I) Establishing Bar Dates and Procedures and (II) Approving the Form and Manner of Notice Thereof [Docket No. 34].

Related Documents:

a. Declaration of Geoffrey Walker in Support of Chapter 11 Petitions and First Day Motions [Docket No. 31];

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Moving Party: Debtors

Status: Uncontested. This matter will go forward on date to be determined.

[Remainder of page intentionally left blank.]

Dated: May 10, 2024

Dallas, Texas

/s/ William L. Wallander

VINSON & ELKINS LLP

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- and -

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CERTIFICATE OF SERVICE

I certify that on May 10, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Matthew D. Struble
One of Counsel